

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH CHAN, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, *et al.*,

Defendants.

Case No. 23-cv-10365-LJL

[rel. 1:24-cv-01644-LJL]

[rel. 1:24-cv-000367-LJL]

DECLARATION OF TAMARA HOFFMAN

I, Tamara Hoffman, declare under penalty of perjury that the following statements are true and correct:

1. My name is Tamara Hoffman, and I currently live in South Battery Park with my young daughter. I have been working in Lower Manhattan for over 19 years.

2. We lived on West St in Lower Manhattan since 2017 and moved across the street into Battery Park City in 2022.

3. My daughter attends school at PS 276 Battery Park City school and has been there since Kindergarten and currently is in 5th grade.

4. On the weekends, we take my daughter to visit her grandparents (my mother-in-law and father-in-law) who live in Douglaston, Queens, which is an Environmental Justice community. To get there, we typically drive to their home

5. My daughter has a sensory processing disorder along with autism and anxiety. This condition makes it difficult for her to use public transportation. For example, when we are trying to time a train to get somewhere in time, especially to make it for a transfer to Long

Island Rail Road, it is extremely hard for her to stay calm.

6. My daughter sees a therapist at NYU child study center each week. We have worked through her anxiety and now she is able to take the subway to the appointment at 33rd Street, but she needs to be driven home after the appointment. This is due to difficulties with large crowds, confined spaces and complicated train transfers at the time her appointment ends. Her doctors encourage us to not exacerbate her sensory issues and to do what makes it easiest for her. Because of this, my husband picks us up from the appointment and drives us home via the FDR Drive and the underpass to the garage.

7. After prior consultation with the team at NYU Child Study Center, if my daughter experiences an urgent medical need and hospitalization is required, we have been encouraged to go to certain hospitals given my daughter's diagnosis of autism and her specific sensory needs. We most likely need to drive her to the hospital using my husband's car, because when she gets anxious and uncontrollably upset, we would not take her on the subway.

8. When my daughter is sick and the pediatrician is closed for the day, we drive into Brooklyn to PM Pediatrics to get her checked out. It is the safest option at night, especially when she is not feeling well.

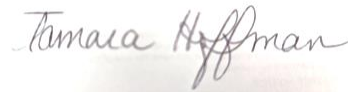
9. My daughter also attends Hebrew school in Manhattan's Financial District (FiDi) which she is often driven to.

10. My family already pays NYC for parking in the garage and the tunnel toll often on the weekends.

11. I've attempted to get information about congestion pricing for years. Even back in 2019, I asked questions about the plan, but information that was shared was not clear and continues to be confusing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2024
New York, New York

A handwritten signature in cursive script, reading "Tamara Hoffman", written in dark ink on a light-colored background.

Tamara Hoffman